

EASTERN DIVERSIFIED METALS OU4
ADMINISTRATIVE RECORD FILE *
INDEX OF DOCUMENTS

III. REMEDIAL RESPONSE PLANNING

1. Administrative Order In The Matter Of: Eastern Diversified Metals Superfund Site; Hometown, Schuylkill County, Pennsylvania, AT&T Nassau Metals Corporation and Theodore Sall, Inc., Respondents, Docket No. III-91-72-DC, 9/30/91. P. 300001-300004.
2. Letter to Mr. Steven Donohue, U.S. EPA, from Mr. Brady Storchi and Mr. R. Neil Davies, Law Environmental, Inc., re: Transmittal of summary data tables containing preliminary data obtained from characterization testing, 10/13/94. P. 300005-300015.
3. Report: Sampling and Analysis Report, Eastern Diversified Metals Site, Schuylkill County, Pennsylvania, prepared by Law Environmental, Inc., 11/94. P. 300016-300095. A November 7, 1994, transmittal letter to Mr. Steven Donohue, U.S. EPA, from Mr. Nicholas Fouts, Mr. Victor Doritis and Mr. R. Neil Davies, Law Environmental, Inc., is attached.
4. Map entitled, "Bottom of Fluff Elevation Map," prepared by Law Environmental, Inc., 11/4/94. P. 300096-300096.
5. Map entitled, "Sampling Location Map/Top of Fluff Elevation Map," prepared by Law Environmental, Inc., 11/7/94. P. 300097-300097.
6. Facsimile memorandum to Mr. Steven Donohue, U.S. EPA, from Mr. Michael Pfarr, U.S. Army Corps of Engineers (USACE), re: Transmittal of comments on the Sampling and Analysis Plan, 12/1/94. P. 300098-300100.
7. Letter to Ms. Judy McCarthy, AT&T, from Mr. Steven Donohue, U.S. EPA, re: Comments on the Sampling and Analysis Plan for the investigation of the fluff

* Administrative Record File available 7/18/00.

pile at the Eastern Diversified Metals Site,
12/8/94.
P. 300101-300103.

8. Letter to Mr. Steven Donohue, U.S. EPA, from Mr. Nicholas Fouts, Mr. James Browne, Mr. Victor Doritas, and Mr. R. Neil Davies, Law Environmental, Inc., re: Response to EPA's comments concerning the Eastern Diversified Metals Site Sampling and Analysis Report, 2/27/95. P. 300104-300116.
9. Letter to Mr. Steven Donohue, U.S. EPA, from Mr. Nicholas Fouts, Mr. Victor Doritis and Mr. R. Neil Davies, Law Environmental, Inc., re: Expanded response to EPA's comments on the Sampling and Analysis Report, 3/31/95. P. 300117-300119.
10. Letter to Mr. Victor Doritis, Law Environmental, Inc., from Mr. Paul Brafford, Law Environmental National Laboratories, re: Transmittal of data report and samples, 11/30/95. P. 300120-300121.
11. Letter to Ms. Judy McCarthy, AT&T, from Mr. Nicholas Fouts, Mr. Victor Doritis and Mr. David Pauls, Law Environmental, Inc., re: Transmittal of results from sampling, analysis and testing activities during the MacLeod treatability study for the Eastern Diversified Metals Site, 3/11/96. P. 300122-300131.
12. Report: Treatability Study Report for the Recycling of Fluff, Eastern Diversified Metals Site, Hometown, Pennsylvania, prepared by Philip Environmental Services, Inc., 4/12/96. P. 300132-300155.
13. Letter to Ms. Judy McCarthy, AT&T, from Mr. Nicholas Fouts, Mr. Victor Doritis and Mr. David Pauls, Law Environmental, Inc., re: Transmittal of results from sampling, analysis and testing activities during the MacLeod treatability study for the Eastern Diversified Metals Site, 5/6/96. P. 300156-300166.
14. Letter to Ms. Judy McCarthy, AT&T, from Mr. Nicholas

Fouts, Mr. Victor Doritis, Mr. David Pauls and Ms. Cynthia Draper, Law Environmental, Inc., re: Transmittal of results from sampling, analysis and testing activities during the Philip treatability study for the Eastern Diversified Metals Site, 5/16/96.
P. 300167-300186.

15. Letter to Ms. Judy McCarthy, Lucent Technologies, Inc., from Mr. Steven Donohue, U.S. EPA, re: Comments on the Philip Environmental treatability study letter and report by Law Environmental, 6/17/96.
P. 300187-300192.
16. Letter to Mr. Steven Donohue, U.S. EPA, from Mr. Nicholas Fouts, Mr. Victor Doritis and Mr. David Pauls, Law Environmental, Inc., re: Response to EPA's comments on the Philip's treatability study report, prepared by Law Environmental, 7/25/96.
P. 300193-300202.
17. Letter to Ms. Judy McCarthy, Lucent Technologies, Inc., from Ms. Teresa Spezio and Mr. Jeffrey Young, Philip Environmental Services, re: Response to EPA's comments on the Eastern Diversified Site treatability study, 7/25/96. P. 300203-300214.
18. Letter to Mr. Steven Donohue, U.S. EPA, from Mr. Nicholas Fouts, Mr. Victor Doritis and Ms. Cynthia Draper, Environmental Services, Inc., re: Transmittal of results from additional Polychlorinated biphenyl studies, 8/29/96. P. 300215-300223.
19. Letter to Mr. Steven Donohue, U.S. EPA, from Mr. Nicholas Fouts, Law Environmental, Inc., re: Transmittal of revised pages for Law Environmental's 1996 report entitled, "Results from Sampling, Analysis, and Testing Activities during the Philip Treatability Study," 9/5/96. P. 300224-300232.

20. Letter to Mr. Steven Donohue, U.S. EPA, from Mr. Gary Emmanuel, Environmental Resources Management (ERM),
re: Removal of sediments from an unnamed tributary to the Schuylkill River at the Eastern Diversified Metals Site, 11/26/96. P. 300233-300243. A December 13, 1996, letter to Ms. Judy McCarthy, Lucent Technologies, Inc., from Mr. Peter Schaul, U.S. EPA, regarding the suspension of sediment removal; a November 5, 1996, letter to Mr. Steven Donohue, U.S. EPA, from Mr. Gary Emmanuel, ERM, regarding the status of sediment removal from an unnamed tributary; and a November 26, 1996, map entitled, "Access for Unnamed Tributary Sediment Removal, Eastern Diversified Metals Site", are attached.
21. Report: Operable Unit 3 Focused Feasibility Study Work Plan, Eastern Diversified Metals Site, prepared by ERM, 8/22/97. P. 300244-300331. The following are attached:
- a) An August 22, 1997, transmittal letter to Mr. Steven Donohue, U.S. EPA, from Mr. David Steele, ERM;
 - b) A December 15, 1997, memorandum to Eastern Diversified Metals Focused Feasibility Study (FFS) File, from Mr. Doug Shenk and Mr. Gary Emmanuel, ERM, documenting a conference call regarding the applicability of DC Graphite Arc Melter Technology;
 - c) A March 24, 1998, letter to Mr. Steven Donohue, U.S. EPA, from Mr. Gary Emmanuel, ERM, regarding further details concerning Alternative 3, in particular feasibility of metals recovery and polyethylene separation for resource recovery;
 - d) An October 15, 1997, letter to Mr. Valdis Jurka, Lucent Technologies, Inc., from Mr. Steven Donohue, U.S. EPA, regarding comments on the FFS Work Plan;

e) An October 23, 1997, letter to Mr. Valdis Jurka, Lucent Technologies, Inc., from Mr. Steven Donohue, U.S. EPA, regarding comments on the treatability study for OU3;

f) A November 4, 1997, letter to Mr. Steven Donohue, U.S. EPA, from Mr. David Steele, ERM, regarding responses to EPAs comments on the FFS Work Plan;

g) A February 23, 1998, letter to Mr. Steven Donohue, U.S. EPA, from Mr. Douglas Shenk, ERM, transmitting a revised draft outline and updated schedule for the FFS.

h) A February 17, 1998, facsimile to Mr. Steven Donohue, U.S. EPA, Ms. Meg Mustard, Pennsylvania Department of Environmental Protection (PADEP), and Ms. Mimi Boxwell, USACE, from Mr. Gary Emmanuel, ERM, transmitting a description of treatability work being performed by Severson Environmental Services, Inc., for the FFS.

22. Report: Operable Unit 3 Draft Focus Feasibility Study Report, Eastern Diversified Metals Site, prepared by ERM, 8/6/98. P. 300332-300418. An August 6, 1998, transmittal letter to Mr. Steven Donohue, U.S. EPA, from Mr. Gary Emmanuel, ERM, is attached.

23. Report: Addendum to the 6 August 1998 Draft Focused Feasibility Study Report, Eastern Diversified Metals Site, prepared by ERM, 8/20/98. P. 300419-300475. The following are attached:

- a) An August 20, 1998, transmittal letter to Mr. Steven Donohue, U.S. EPA, from ERM;
- b) A September 15, 1998, memorandum to Mr. Steven Donohue, U.S. EPA, from Mr. Douglas Donor, U.S. EPA, regarding Resource Conservation and Recovery Act (RCRA) Program comments on the August 20, 1998, addendum to the draft FFS;
- c) A September 24, 1998, memorandum to Mr. Steven Donohue, U.S. EPA, from Mr. Christopher Corbett, U.S. EPA, regarding comments on the addendum to the draft FFS;
- d) A September 11, 1998, letter to Mr. Steven Donohue, U.S. EPA, from Mr. Valdis Jurka, Lucent Technologies, Inc., discussing further comments on the addendum to the draft FFS, particularly concerning the in-place closure remedial alternative;
- e) An October 15, 1998, letter to Mr. Steven Donohue, U.S. EPA, from Ms. Meg Mustard, PADEP, regarding PADEPs comments on the addendum to the draft FFS;
- f) A January 29, 1998, letter to Mr. Valdis Jurka, Lucent Technologies, Inc., from Mr. Frank Vavra, U.S. EPA, regarding EPA's comments on the addendum to the draft FFS;

24. Memorandum to Mr. Steven Donohue, U.S. EPA, from Mr. Douglas Donor, U.S. EPA, re: RCRA Program comments on the draft FFS, 9/15/98. P. 300476-300478.

25. Memorandum to Mr. Steven Donohue, U.S. EPA, from Mr. Christopher Corbett, U.S. EPA, re: Comments

on the draft FFS, 9/17/98. P. 300479-300480.

26. Letter to Mr. Steven Donohue, U.S. EPA, from Ms. Meg Mustard, PADEP, re: PADEP's comments on the FFS, 9/23/98. P. 300481-300482.
27. Letter to Mr. Valdis Jurka, Lucent Technologies, Inc., from Mr. Steven Donohue, U.S. EPA, re: Comments on the FFS, 9/25/98. P. 300483-300486.
28. Letter to Mr. Steven Donohue, U.S. EPA, from Mr. Douglas Shenk, ERM, re: Response to EPA and PADEP's comments on the August 6, 1998, OU3 draft FFS and transmittal of revised text, 10/22/98. P. 300487-300545. An October 22, 1998, revised FFS report is attached.
29. Letter to Mr. Valdis Jurka, Lucent Technologies, Inc., from Mr. Frank Vavra, U.S. EPA, re: Comments on the FFS, 1/21/99. P. 300546-300554. An October 1989, EPA Guidance Document entitled, "RCRA ARARs: Focus on Closure Requirements," OSWER Directive 9234.2-O4FS, is attached.
30. Report: Revised Focused Feasibility Study, prepared by ERM, 2/12/99. P. 300555-300607.
31. Report: Geotechnical Investigation Work Plan, Eastern Diversified Metals Site, prepared by ERM, 3/12/99. P. 300608-300624. A March 12, 1999, transmittal letter, to Mr. Frank Vavra, U.S. EPA, from Mr. Gary Emmanuel, ERM, and a February 25, 1999, letter to Mr. Valdis Jurka, Lucent Technologies, Inc., from Mr. Frank Vavra, U.S. EPA, concerning EPA and PADEP's comments on the Geotechnical Investigation, are attached.
32. Letter to Mr. Valdis Jurka, Lucent Technologies, Inc., from Mr. Frank Vavra, U.S. EPA, re: Unresolved issues surrounding the revised FFS review, 3/16/99. P. 300625-300627.
33. Letter to Mr. Frank Vavra, U.S. EPA, from Mr. Gary

Emmanuel, ERM, re: Transmittal of results of Geotechnical Investigation, 4/1/99. P. 300628-300744. A July 19, 1999, letter to Mr. Frank Vavra, U.S. EPA, from Mr. Gary Emmanuel, ERM transmitting corrected triaxle shear results and a revised summary table, and an April 23, 1999, review of the geotechnical investigation results, are attached.

34. Letter to Mr. Frank Vavra, U.S. EPA, from Mr. Gary Emmanuel, ERM, transmitting a draft of the FFS report for OU3, 7/19/99. P. 300745-300809. The July 19, 1999, draft FFS report is attached.
35. Letter to Mr. Frank Vavra, U.S. EPA, from Mr. Gary Emmanuel, ERM, re: Investigations related to polychlorinated biphenyl(PCB) concentrations in fluff used during remediation, 7/20/99. P. 300810-300815.
36. Memorandum to Mr. Frank Vavra, U.S. EPA, from Ms. Linda Watson, U.S. EPA, re: Comments on the 1992 ROD Risk Assessment for OU3, 7/21/99. P. 300816-300832. The following are attached:
 - a) An October 26, 1999, memorandum to Mr. Frank Vavra, U.S. EPA, from Ms. Linda Watson, U.S. EPA, regarding comments on the cleanup goals for surface soil in the 1990 risk assessment;
 - b) An October 26, 1999, electronic mail memorandum to Mr. Frank Vavra, U.S. EPA, from Ms. Linda Watson, U.S. EPA, regarding

cleanup goals for lead;

- c) A January 24, 2000, memorandum to Mr. Gary Emmanuel and Mr. Douglas Shenk, ERM, from Ms. Connie Faustini, ERM, regarding surface soil cleanup levels at the Eastern Diversified Metals Site;
- d) An April 27, 2000, memorandum to Mr. Frank Vavra, U.S. EPA, from Ms. Linda Watson, U.S. EPA, regarding revised cleanup goals for surface soil at the Eastern Diversified Metals Site;
- e) A May 23, 2000, memorandum to Mr. Frank Vavra, U.S. EPA, from Ms. Patricia Flores, U.S. EPA, regarding possible ambient air concentrations of bis(2-ethylhexyl)phthalate that workers would be exposed to during remedial operations.

37. Report: Revised Field Demonstration Report, Eastern Diversified Metals Site, Hometown, Pennsylvania, prepared by ERM, 9/15/99. P. 300833-300886. The following are attached:

- a) An August 17, 1999, letter to Mr. Valdis Jurka, Lucent Technologies, Inc., from Mr. Frank Vavra, U.S. EPA, transmitting USACE comments on the field demonstration report for the Eastern Diversified Metals Site;

- b) A May 21, 1999, letter to Mr. Valdis Jurka, Lucent Technologies, Inc., from Mr. Frank Vavra, U.S. EPA, regarding EPA and USACE comments on the field demonstration work plan;
 - c) A September 1, 1999, memorandum to Mr. Frank Vavra, U.S. EPA, from Mr. Douglas Shenk, ERM, responding to an August 17, 1999, letter regarding the Eastern Diversified Metals Site field demonstration report;
 - d) An August 31, 1999, letter to Mr. Frank Vavra, U.S. EPA, from Mr. Douglas Shenk, ERM, transmitting the revised field demonstration report for the Eastern Diversified Metals Site.
- 38. Letter to Mr. Valdis Jurka, Lucent Technologies, Inc., from Mr. Frank Vavra, U.S. EPA, re: Final comments on the FFS, 10/4/99. P. 300887-300889.
- 39. Letter to resident from Mr. Ronald Schock, PADEP, re: Transmittal of well water supply test results, 11/23/99. P. 300890-300894. A November 24, 1999, letter to File from Mr. Ronald Schock, PADEP, regarding results of well water tests from resident (HW-1) and the November 4, 1999, test results are attached.
- 40. Letter to Mr. Fred Blechinger, Lucent Technologies, Inc., from Mr. Frank Vavra, U.S. EPA, re: Notification of EPA's conditional approval of the FFS, 12/30/99. P. 300895-300897.
- 41. Letter to Mr. Fred Blechinger, Lucent Technologies, Inc., from Mr. Frank Vavra, U.S. EPA, re: Notification of EPA's approval of FFS, 1/20/00. P. 300898-300898.
- 42. Letter to Mr. Joseph Iannuzzo, Pennsylvania

Department of Environmental Resources (PADER), from Mr. Frank Vavra, U.S. EPA, re: Information concerning Bundy Corporations possible involvement with OU3, 1/20/00. P. 300899-300899.

43. Report: Final Operable Unit 3 Focused Feasibility Study Report, Eastern Diversified Metals Site, prepared by ERM, 1/11/00. P. 300900-301030. A January 20, 1999, letter to Mr. Fred Blechinger, Lucent Technologies, Inc., from Mr. Frank Vavra, U.S. EPA, granting approval to the final FFS, and a January 11, 2000, letter to Mr. Frank Vavra, U.S. EPA, from Mr. Douglas Shenk, ERM, submitting copies of the final FFS, are attached.

44. Letter to Mr. Anthony Conte, U.S. Department of the Interior, from Mr. Frank Vavra, U.S. EPA, re:

Notification of Record of Decision (ROD) Amendment for OU3 at the Eastern Diversified Metals Site, 1/27/00. P. 301031-301047. The following are attached:

- a) A January 27, 2000, letter to Ms. Sharon Shutler, National Oceanic Atmospheric Administration (NOAA), from Mr. Frank Vavra, U.S. EPA, regarding issuance of a ROD Amendment for OU3 at the Eastern Diversified Metals Site;
- b) A January 27, 2000, letter to Mr. Mike Chezik, U.S. Office of Environmental Affairs, from Mr. Frank Vavra, U.S. EPA, regarding the issuance of a ROD Amendment for OU3 at the Eastern Diversified Metals Site;
- c) A May 26, 2000, memorandum to Mr. Frank Vavra, U.S. EPA, from Mr. Bruce Pluta, U.S. EPA, regarding comments on the Proposed Remedial Action Plan for OU4 at the Eastern Diversified Metals Site;
- d) A May 17, 2000, memorandum to Mr. Frank Vavra, U.S. EPA, from Mr. Bruce Pluta, U.S. EPA, regarding comments on the FFS for OU3;
- e) A June 27, 2000, letter to Mr. Jim Kunkle, PADEP, from Mr. Frank Vavra, U.S. EPA, transmitting the Proposed Plan for OU4.

V. COMMUNITY INVOLVEMENT/CONGRESSIONAL
CORRESPONDENCE/IMAGERY

1. U.S. EPA Fact Sheet, re: Update on work at the Eastern Diversified Metals Site, Rush Township, Schuylkill County, Pennsylvania, 2/99. P. 500001-500004.
2. Letter to Mr. John Reeder, U.S. EPA, from Senator Arlen Specter, U.S. Senate, re: Concerns with the delay of cleanup at the Eastern Diversified Metals Site, 2/3/99. P. 500005-500005.
3. Letter to Ms. Lisa Brown, U.S. EPA, from Representative Timothy Holden, U.S. House of Representatives, re: Status of the cleanup at Eastern Diversified Metals Site, 2/3/99. P. 500006-500009. A March 3, 1999, letter to the Honorable Timothy Holden, U.S. House of Representatives, from Mr. Michael McCabe, U.S. EPA, responding to the Congressman's request for information on the status of the cleanup at Eastern Diversified Metals, is attached.
4. Letter to Mr. Michael McCabe, U.S. EPA, from Representative David Argall, Pennsylvania House of Representatives re: Notification of opposition to capping the fluff pile, 3/19/99. P. 500010-500011.
5. Internet Printout of Deadalus Project, Inc., (DPI), re: Description of the "World Shelter Project," 5/24/99. P. 500012-500021.
6. Letter to Mr. Abraham Ferdas, U.S. EPA, from Representative Timothy Holden, U.S. House of Representatives, re: Proposal to remove piles of fluff from Eastern Diversified Metals Site to another site, 5/28/99. P. 500022-500039. The following are attached:
 - a) A May 20, 1999, letter to Mr. Abraham Ferdas, U.S. EPA, from Mr. E. A. McCulloch, (DPI), recommending the removal of fluff piles from the Eastern Diversified Metals

Site;

- b) A July 1, 1999, letter to the Honorable Timothy Holden, U.S. House of Representatives, from Mr. Michael McCabe, U.S. EPA, discussing EPA's reasons for not approving the fluff pile removal method at the Eastern Diversified Metals Site;
- c) A June 2, 1999, letter to Mr. Edward McCulloch, DPI, from Mr. Abraham Ferdas, U.S. EPA, regarding EPA's objections to DPI's proposal for the Eastern Diversified Metals Site;
- d) A May 20, 1999, letter to Mr. Abraham Ferdas, U.S. EPA, from Mr. E. A. McCulloch, DPI, regarding DPI's proposal to remove the fluff pile from the Eastern Diversified Metals Site;
- e) An April 6, 1999, letter to Mr. Edward McCulloch, DPI, from Mr. Abraham Ferdas, U.S. EPA, regarding the Superfund process and concerns with DPI's proposal for the Eastern Diversified Metals Site;
- f) A March 16, 1999, facsimile cover sheet to Mr. Abraham Ferdas, U.S. EPA, from Mr. E. A. McCulloch, DPI;
- g) A March 16, 1999, letter to Mr. Tom Scheckels, U.S. EPA, from Mr. E. A. McCulloch, DPI, regarding the proposal for removal of fluff pile from the Eastern Diversified Metals Site;
- h) A January 14, 1999, letter agreement, to Mr. Ralph McMurry, Lucent Technologies, Inc., from Mr. Herbert Rosenblum;
- i) a January 14, 1999, letter to Mr. Ralph McMurry, Lucent Technologies, Inc., from Mr. Herbert Rosenblum, discussing a confidentiality letter agreement;

- j) A February 10, 1999, letter to Mr. Herbert Rosenblum, from Mr. Ralph McMurry, Lucent Technologies Inc., confirming the confidentiality agreement.
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- 7. Letter to Mr. Michael McCabe, U.S. EPA, from Representative David Argall, Pennsylvania House of Representatives, re: Concerns about the Eastern Diversified Metals Site, 11/19/99. P. 500040-500042.

A December 14, 1999, letter to Representative David Argall, Pennsylvania House of Representatives, from Mr. Thomas Voltaggio, U.S. EPA, discussing recent developments at the Eastern Diversified Metals Site, is attached.
 - 8. Letter to Mr. Thomas Voltaggio, U.S. EPA, from Senator James Rhoades, Pennsylvania State Senate, re: Submittal of a correspondence package by Mr. Daniel Pinkey, Chairmen of the Rush Township Environmental Advisory Council, concerning the Eastern Diversified Site, 11/19/99. P. 500043-500130.
 - 9. Letter to Mr. John Reeder, U.S. EPA, from U.S. Senator Arlen Specter, U.S. Senate, re: Transmittal of a letter from Mr. Daniel Pinkey and a bag containing a fluff sample, 2/10/00. P. 500131-500134. A November 8, 1999, letter to Senator Arlen Specter, U.S. Senate, from Mr. Daniel Pinkey, Rush Township Environmental Advisory Council, regarding cleanup at the Eastern Diversified Metals Site, and a March 7, 2000, letter to Mr. Daniel Pinkey, Rush Township Environmental Advisory Council, from Mr. Bradley Campbell, U.S. EPA, regarding status of fluff pile at the Eastern Diversified Metals Site.

SITE SPECIFIC GUIDANCE DOCUMENTS

1. OSWER Directive #9355.4-01, re: A Guide on Remedial Actions at Superfund Sites with PCB Contamination, 8/90.
2. OSWER Directive 9200.4-26, re: Approach for addressing Dioxin in soil at CERCLA and RCRA sites, 4/13/98.